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Counsel for TransCanada Keystone Pipeline, LP and TC Energy Corporation

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
GREAT FALLS DIVISION**

INDIGENOUS ENVIRONMENTAL
NETWORK and NORTH COAST RIVERS
ALLIANCE,

Plaintiffs,

vs.

PRESIDENT DONALD J. TRUMP,
UNITED STATES DEPARTMENT OF
STATE; MICHAEL R. POMPEO, in his
official capacity as U.S. Secretary of State;
UNITED STATES ARMY CORPS OF
ENGINEERS; LT. GENERAL TODD T.
SEMONITE, Commanding General and
Chief of Engineers; UNITED STATES FISH
AND WILDLIFE SERVICE, a federal
agency; GREG SHEEHAN, in his official
capacity as Acting Director of the U.S. Fish
and Wildlife Service; UNITED STATES
BUREAU OF LAND MANAGEMENT, and
DAVID BERNHARDT, in his official

CV 19-28-GF-BMM

**TRANSCANADA
KEYSTONE PIPELINE, LP
AND TC ENERGY
CORPORATION'S
SUPPLEMENTAL STATUS
REPORT**

capacity as Acting U.S. Secretary of the Interior,

Defendants,

TRANSCANADA KEYSTONE PIPELINE,
LP, a Delaware limited partnership, and TC
ENERGY CORPORATION, a Canadian
Public company,

Defendant-Intervenors.

On September 20, 2019, Defendants TransCanada Keystone Pipeline, LP and TC Energy Corporation (TC Energy) filed a status report with this Court, reporting on its intentions to take certain steps with regard to specific, pre-construction activities on private lands. (Doc. 62). Subsequently, TC Energy informed counsel that it is continuing to assess the appropriate timeline for conducting preconstruction activities. With the exception of weed eradication, which is already complete, and the orderly winddown of certain road upgrade work, preconstruction work will not occur until, at the earliest, after the hearing scheduled for October 9, 2019. TC Energy will further advise the Court of its plans at the October 9 hearing.

DATED this 3rd day of October, 2019,

CROWLEY FLECK PLLP

SIDLEY AUSTIN LLP

/s/ Jeffery J. Oven

Jeffery J. Oven

Mark L. Stermitz

/s/ Peter R. Steenland, Jr.

Peter R. Steenland, Jr.

Peter R. Whitfield

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served today via the Court's CM/ECF system on all counsel of record.

/s/ Jeffery J. Oven